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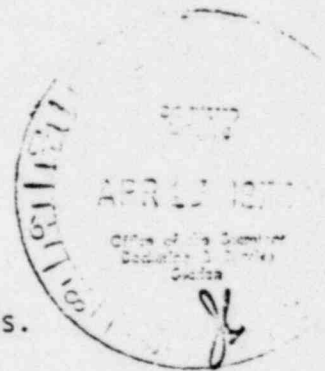
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Notice
Reg. Guide 1.144

U.S. Nuclear Regulatory Commission
Office of Standards Development
Washington, D.C. 20555

March 1, 1979



Attention: Mr. Guy A. Arlotto, Director of Engineering Standards.

Reference: Regulatory Guide 1.144 (January 1979), Auditing of Quality Assurance Programs For Nuclear Power Plants.

Gentlemen:

The Bechtel Power Corporation has reviewed the reference Regulatory Guide and would like to offer the following comments for your consideration.

Similar comments were made to this Guide on August 2, 1978, when it was 1.xx (RS 035-2) Draft 1, May 3, 1978, and our concerns still exist:

1. Section 3. (a) (2):

We are not in agreement with the proposed regulatory guide position where it requires internal audits (design and construction phase) to be conducted, ".... at least annually or at least once within the life of the activity, whichever is shorter." This puts scheduling on an arbitrary administrative basis that ANSI N45.2.12-1977 justifiably got away from. The standard provides for making rationale judgements regarding scheduling of audits (lengthening or shortening frequency for good cause). We recommend that the regulatory guide endorse the standard with regard to scheduling of internal audits. As a less desirable alternative, the approach used in 3.b.2 for scheduling of external audits could be applied to internal audits, leaving the responsible organization the option of employ a system for greater than annual audit frequency with justification.

2. Section 3. (b) (1):

We recommend that the scope of procurement actions that do not require external audits be extended to include those where acceptance is by source verification or post installation test. Acceptance by source verification and post installation tests are carried out in N45.2.13-1976, Sections 10.3.1 and 10.3.4, respectively, and represent acceptance methods that are equivalent to receiving inspection and should be acceptable as alternates to external audits.

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3. Section 4. (a):

We also are not in agreement with the proposed regulatory guide position that would require the performance of a supplemental audit when any of the conditions of paragraph 3.5.3.3 through 3.5.3.6 of the standard exist. An organization may have a perfectly acceptable means other than a formal audit for assessing a quality assurance program for the conditions listed in 3.5.3.3 through 3.5.3.6. Means such as surveillance by inspection personnel, spot checks or investigations by management or engineering personnel, etc., could be employed. These means do not require the total scope of administrative activities required by ANSI N45.2.12-1977 for audits and could more efficiently provide an assessment of a quality assurance program in some instances (generally when the "scope" of investigative area is limited).

We recommend that the regulatory guide endorse the standard which would allow an auditing organization the option of performing a supplemental audit or employing another, less formal, means of assessing a quality assurance program.

4. Section 4. (b):

We are concerned with the proposed regulatory guide position that would require that specific attention be given during an audit to corrective action on program deficiencies identified during previous audits. A viable follow-up and corrective action close out system (this type of system would respond to paragraphs 3.2.5 and 4.5.2.4 of the standard) should be adequate, without mandatory later supplementary action by auditors. We recommend that the regulatory guide endorse the standard and allow the auditing organization the option of how best to meet the objective of paragraph 3.2.5 of the standard.

Please feel free to contact me (415) 768-7980 if you have any questions.

Very truly yours,


J. B. Violette
Manager of Quality Assurance
Thermal Power Organization

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